

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON - SEATTLE

ALLSTATE PROPERTY AND
CASUALTY INSURANCE COMPANY, as
subrogee of Somchai and Duangta
Ritnoppakun

Plaintiff,

v.

SAMSUNG ELECTRONICS AMERICA,
INC., a foreign corporation,

Defendant.

NO. 2:23-cv-01447-MJP

STIPULATED MOTION FOR
LIMITED ADJUSTMENT OF CASE
SCHEDULE

DATE ON MOTION CALENDAR:
MAY 6, 2024

I. STIPULATION

The parties respectfully request adjustments to the Court's Order Setting Trial Date and Related Dates (dkt. #11) regarding the discovery deadlines, as provided below. Good cause for the adjustments exists. The parties have been making diligent efforts to complete discovery. They have exchanged written discovery, are in the process of scheduling depositions, and their experts are working to arrange for a joint inspection so reports can be finalized. However, some discovery has taken slightly longer than anticipated due to unforeseen circumstances. There have been some challenges in locating the homeowners in order to schedule their depositions, and some documents took longer than anticipated to locate for production. Additionally, while

STIPULATED MOTION FOR LIMITED ADJUSTMENT OF CASE
SCHEDULE – 1
2:23-cv-01447-MJP

**WILSON, ELSER, MOSKOWITZ,
EDELMAN & DICKER LLP**
520 PIKE STREET, SUITE 2350
SEATTLE, WA 98101
(206) 709-5900 (MAIN)
(206) 709-5901 (FAX)

experts have been retained, the defense expert's schedule does not allow for completion of the inspection of the product and production of a report in compliance with the existing case schedule.

The parties therefore request the Court adjust and continue the discovery deadlines in this case for one month, as provided below.

	Current Date	Proposed Date
Reports from expert witness under FRCP 26(a)(2) due	May 20, 2024	June 20, 2024
All motions related to discovery must be filed by and noted on the motion calendar on the third Friday thereafter (see CR7(d))	June 20, 2024	July 19, 2024
Discovery completed by	July 19, 2024	August 19, 2024

DATED this 7th day of May, 2024.

WILSON, ELSE, MOSKOWITZ,
EDELMA & DICKER LLP

/s/ Carinne E. Bannan

Dirk J. Muse, WSBA #28911
Carinne Bannan, WSBA #52564
520 Pike Street, Suite 2350
Seattle, WA 98101
(206) 709-5878 (direct)
dirk.muse@wilsonelser.com
carinne.bannan@wilsonelser.com

*Attorneys for Defendant Samsung
Electronics America, Inc.*

LAW OFFICES OF SHUMSKY &
BACKMAN

/s/ Brent Hardy

George M. Shumsky, WSBA #33915
Barbara J. Backman, WSBA #25670
Brent Hardy, WSBA #45405
219 NW 20th Ave, Suite 201
Battle Ground, WA 98604
360-891-0442
brent@shumsky-backman.com

*Attorneys for Plaintiff Allstate Property
and Casualty Insurance Company*

ORDER

Based on the foregoing, the Stipulated Motion for limited adjustment of case schedule is granted.

Dated: May 7, 2024



Honorable Marsha J. Pechman
United States Senior District Judge